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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91195630
Party	Defendant Golden Spirits L.L.C. DBA Million Vodka
Correspondence Address	WENDY B MILLS LAW OFFICE OF WENDY B MILLS 100 CRESCENT COURT, STE 700 DALLAS, TX 75201 UNITED STATES wbm@wbmillslaw.com
Submission	Motion to Extend
Filer's Name	Wendy B. Mills
Filer's e-mail	wbm@wbmillslaw.com
Signature	/Wendy B. Mills/
Date	07/13/2011
Attachments	App Motion to Extend Proceedings.pdf (3 pages)(11968 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MILLION BEVERAGE, LLC	§	
	§	
Opposer,	§	Opposition No. 91195630
	§	
	§	Serial No. 77626383
v.	§	
	§	
	§	
GOLDEN SPIRITS, LLC	§	
	§	
Applicant.	§	

APPLICANT'S MOTION TO EXTEND PROCEEDINGS

Golden Spirits, LLC, Applicant ("Applicant") requests that proceedings herein be extended for sixty (60) days, and that the trial dates be reset accordingly.

The requested extension is for good cause and not for delay, because the Applicant Golden Spirits, Inc. ("Applicant") just recently retained counsel for the first time on June 13, 2011; discovery remains to be completed by the parties and Applicant's Motion for Leave to File an Amended Answer must be filed to avoid an injustice. Moreover, the present schedule for this matter, which was previously reset on May 16, 2011, requires that Opposer Million Beverage, LLC ("Opposer") make its Pretrial Disclosures on July 20, 2011 and Discovery is scheduled to close one week before this date on July 13, 2011. If the deadlines remain as scheduled, the parties will experience undue hardship or burden in completing discovery and preparing for trial in such a short time, which may cause prejudice to one or both of the parties.

. The Applicant respectfully requests the trial schedule be reset as follows:

Time to Answer:	CLOSED
Deadline for Discovery Conference	CLOSED
Discovery Opens:	09/20/2010
Initial Disclosures Due:	CLOSED
Expert Disclosures Due	CLOSED
Discovery Period to Close:	09/13/2011
Plaintiff's Pre-Trial Disclosures	10/27/2011
Plaintiff's 30-day Trial Period Ends:	12/06/2011
Defendant's Pretrial Disclosures:	01/06/2012
Defendant's 30-day Trial Period Ends:	02/20/2012
Plaintiff's Rebuttal Disclosures:	03/05/2012
Plaintiff's 15-day Rebuttal Period Ends:	04/05/2012

The parties conferred on this matter, but when Defendant presented a copy of this Motion for review and approval at approximately 3:54 p.m. (CDT) on July 12, 2011, no response was received by Defendant and as such, this Motion is presumed to be opposed.

Dated: July 12, 2011

Respectfully submitted,

By: __/Wendy B. Mills/ Wendy B. Mills LAW OFFICE OF WENDY B. MILLS

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Attorney for Applicant **GOLDEN SPIRITS, LLC**

CERTIFICATE OF TRANSMISSION

I hereby certify that this paper is being electronically transmitted to the United States Patent and Trademark Office on the date below:

July 12, 2011

/Wendy B. Mills/ Wendy B. Mills

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of July, 2011, a true and correct copy of the foregoing document was served by electronic mail and facsimile on counsel of record for Opposer..

/Wendy B. Mills/ Wendy B. Mills